

MEMO ENDORSED

March 29, 2024

VIA ECF

Hon. Jessica G. L. Clarke
U.S. District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: April 1, 2024
New York, New York

**Re: Wenzhou Charmhome Electronic Tech. Co., Ltd. v. Koninklijke Philips N.V.
Civil Action No. 1:23-cv-08453-JGLC**

Dear Judge Clarke:

The parties, Plaintiff Wenzhou Charmhome Electronic Tech. Co., Ltd. (“Charmhome”) and Defendant Koninklijke Philips N.V. (“Philips”), jointly request to stay all deadlines, including Philips’ answer deadline, as the parties are in the process of finalizing a settlement agreement and expect to exchange signature pages next week. The current deadline to respond to the original Complaint is March 29, 2024, in accordance with the Court’s Endorsed Order dated March 15, 2024 (ECF No. 17). The parties need additional time to finalize a settlement as this case involves international parties, with Charmhome headquartered in China and Philips headquartered in The Netherlands. Both parties agree to the requested stay. If the Court is not inclined to grant a stay, the parties alternatively request that the answer deadline be extended by two weeks to April 12, 2024. This would be the fourth request for an extension of the answer deadline. The parties respectfully seek this extension in good faith to conserve the resources of the parties and the Court. Both parties agree to the requested extension.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Lance Liu (with permission)

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/s/ Jeremy P. Occek

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